

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION**

**Case No. 9:24-cv-80713-RLR**

SCOTT L. and ELENA SHLEIFER,

Plaintiffs,

vs.

UNITED STATES OF AMERICA,

Defendant.

\_\_\_\_\_ /

**DECLARATION OF BRIAN C. WILLE IN SUPPORT OF PLAINTIFFS’  
RESPONSE IN OPPOSITION TO DEFENDANT’S MOTION FOR  
SUMMARY JUDGEMENT**

I, Brian C. Wille, an attorney duly admitted to practice law in the United States District Court for the Southern District of Florida, hereby declare under penalty of perjury:

1. I am a senior counsel at Kostelanetz LLP and an attorney for Plaintiffs Scott L. and Elena Shleifer in this action. I am fully familiar with the matters set forth in this declaration.
2. I submit this declaration in support of Plaintiffs’ Response in Opposition to Defendant’s Motion for Summary Judgment.
3. Attached hereto as Exhibit O is an excerpt of NetJets contracts produced by NetJets as NJ\_005—NJ\_030, NJ\_045—NJ\_064, and NJ\_179—NJ\_180 in response to Defendant’s third-party subpoena.

I, Brian C. Wille, declare under penalty of perjury that the foregoing is true and correct.

Dated: April 28, 2025  
New York, New York

**Brian C. Wille**

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**Certificate of Service**

**I hereby certify** that a true and correct copy of the foregoing was served by CM/ECF filing on April 28, 2025 on all counsel or parties of record on the Service List below.

**Brian C. Wille**

Brian C. Wille

**SERVICE LIST**

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